

C A D W A L A D E R

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September 30, 2021

**VIA ECF**

Magistrate Judge Debra C. Freeman  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Re: (1) *In Re Amazon.com, Inc. eBook Antitrust Litigation*, 1:21-cv-00351  
(2) *Bookends & Beginnings LLC v. Amazon, et al.*, 1:21-cv-02584

Dear Magistrate Judge Freeman:

I write on behalf of all Parties in the above-referenced actions with an update on the status of negotiations related to discovery proceedings. The Parties have exchanged drafts of (1) a protective order governing the confidentiality of certain types of discovery and (2) a stipulated order regarding ESI and general discovery protocols. At this time, negotiations among the Parties remain ongoing and are moving forward towards a consensual resolution of any outstanding disagreements regarding discovery protocols and a protective order.

The Parties have agreed to meet and confer in the coming weeks and will either jointly submit proposed discovery protocols and a protective order by November 1, 2021, or, if they cannot agree, provide the Court with their respective proposals at that time.

Dated: September 30, 2021

Respectfully submitted,

By: /s/ Joel Mitnick  
Joel Mitnick

*Counsel for Defendant Macmillan Publishing  
Group, LLC.*

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Magistrate Judge Debra C. Freeman  
September 30, 2021

cc: Honorary Gregory H. Woods, U.S. District Court Judge  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street  
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cc: All Counsel of Record (via ECF)